



THE CITY OF NEW YORK
LAW DEPARTMENT

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December 20, 2023

Via CM/ECF

Honorable Arun Subramanian
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15A
New York, New York 10007

Re: *Persaud v. City of New York*, et al.
Civil Case No. 22-CV-02919-AS
Law Department File No. 2022-024486

Dear Judge Subramanian:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing Defendants, the City of New York, Sherif Soliman, William Marshall, and Ari Lieberman (collectively, "Defendants"), in the above-referenced action. In accord with Your Honor's Individual Rules of Practice, I write to respectfully request a two-week extension of time for Defendants to move for summary judgment, from December 22, 2023, to January 5, 2024. This is Defendants' second request for an extension of this deadline. Plaintiff Devanand Persaud ("Plaintiff") consents to the requested extension and respectfully requests that his deadline to respond in opposition to Defendants' motion for summary judgment be set at February 5, 2024.

Although Defendant Soliman was deposed on November 8, 2023, a copy of his deposition transcript was not provided by Plaintiff's counsel to me until earlier today, December 20, 2023. A brief extension of time for Defendants to move for summary judgment is necessary because undersigned counsel will not be able to draft Defendants' moving papers in just two days. The requested extension is also necessary to provide my clients time to review the moving papers, which review may be complicated by the upcoming end-of-the-year holidays.

SO ORDERED. No further extensions will be granted for any reason.

Arun Subramanian, U.S.D.J.
Date: December 21, 2023

Respectfully submitted,

/s/

ZACHARY T. ELLIS

Assistant Corporation Counsel

cc: All Counsel of Record via CM/ECF